

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

GORDON ERNST,

Defendant.

Case No. 1:19-cr-10081-IT

**DEFENDANT GORDON ERNST'S MOTION TO JOIN  
CODEFENDANTS' MOTIONS TO DISMISS THE SUPERSEDING INDICTMENT**

Defendant Gordon Ernst, by and through undersigned counsel, moves to join the motions to dismiss the Superseding Indictment and accompanying memoranda filed by Defendants Niki Williams (Dkt. Nos. 326, 327), Donna Heinel (Dkt. Nos. 331, 332), Jovan Vavic (Dkt. Nos. 333, 334), and Jorge Salcedo (Dkt. Nos. 335, 336) in the above-captioned case. These motions to dismiss equally apply to Mr. Ernst with respect to Counts 1, 2, 4, 6, 7, 19, and 22 of the Superseding Indictment. Undersigned counsel therefore wishes to advance the same arguments on Mr. Ernst's behalf and requests permission to join these motions. No prejudice to the government would arise from the allowance of this motion.

Wherefore, for the foregoing reasons, Defendant Gordon Ernst respectfully requests that his motion to join the motions to dismiss the Superseding Indictment filed by Defendants Niki Williams, Donna Heinel, Jovan Vavic, and Jorge Salcedo be allowed.

Dated: December 20, 2019

Respectfully submitted,

GORDON ERNST

By his attorneys,

/s/ Tracy A. Miner

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**LOCAL RULE 7.1(a)(2) CERTIFICATION**

I hereby certify that, pursuant to Rule 7.1(a)(2) of the Local Rules of the United States District Court of Massachusetts, counsel for Mr. Ernst conferred with counsel for the United States on December 20, 2019 regarding joinders of motions to dismiss, and Assistant United States Attorney Eric Rosen informed us that the United States has no objection to Mr. Ernst joining the other defendants' motions to dismiss.

/s/ Seth B. Orkand

Seth B. Orkand

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on December 20, 2019.

/s/ Seth B. Orkand

Seth B. Orkand